UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

SEP 6 2016

MEMORANDUM

SUBJECT: Request for a Time Critical Removal Action at the Lane Plating Site, Dallas, Dallas County, Texas

FROM: William Rhotenberry, Federal On-Scene Coordinator
CERCLA Assessment and Removal Team (6SF-EC)

THRU: for Ronald D. Crossland, Branch Chief
Emergency Management Branch (6SF-E)

TO: Carl E. Edlund, Director
Superfund Division (SF)

I. PURPOSE

This memorandum seeks approval for a time-critical removal pursuant to Section 104 of the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), 42 U.S.C. § 9601 et seq., at the Lane Plating Site, Dallas, Dallas County, Texas (or "Site"). The proposed time-critical removal action calls for the removal and off-site disposal of waste materials stored onsite in tanks, drums, totes and various open topped metal containment devices.

This action meets the criteria for initiating a removal action under the National Contingency Plan ("NCP"), 40 C.F.R. § 300.415. The proposed action is expected to require less than 2 million dollars and 12 months to complete. The Site was referred to EPA by the Texas Commission on Environmental Quality (TCEQ).

II. SITE CONDITIONS AND BACKGROUND

CERCLIS #: TXN000607031
Category of Removal: Time Critical
Site ID #: A6MS
Latitude: 32.6878557 N
Longitude: 96.7692897 W

9924666

A. Site Description

1. Removal Site Evaluation

Lane Plating Works, Inc. is an abandoned electroplating facility that contains electroplating wastes from operations that ended in 2015. The original facility building and structures containing wastes are still present on-site. The site consists of the Main Plating Building (MPB) where the majority of operations took place, and an external, unsealed shed structure known as the Hazardous Waste Treatment Building (HWTB), located south of the MPB. A chain-link fence isolates the site from Bonnie View Road.

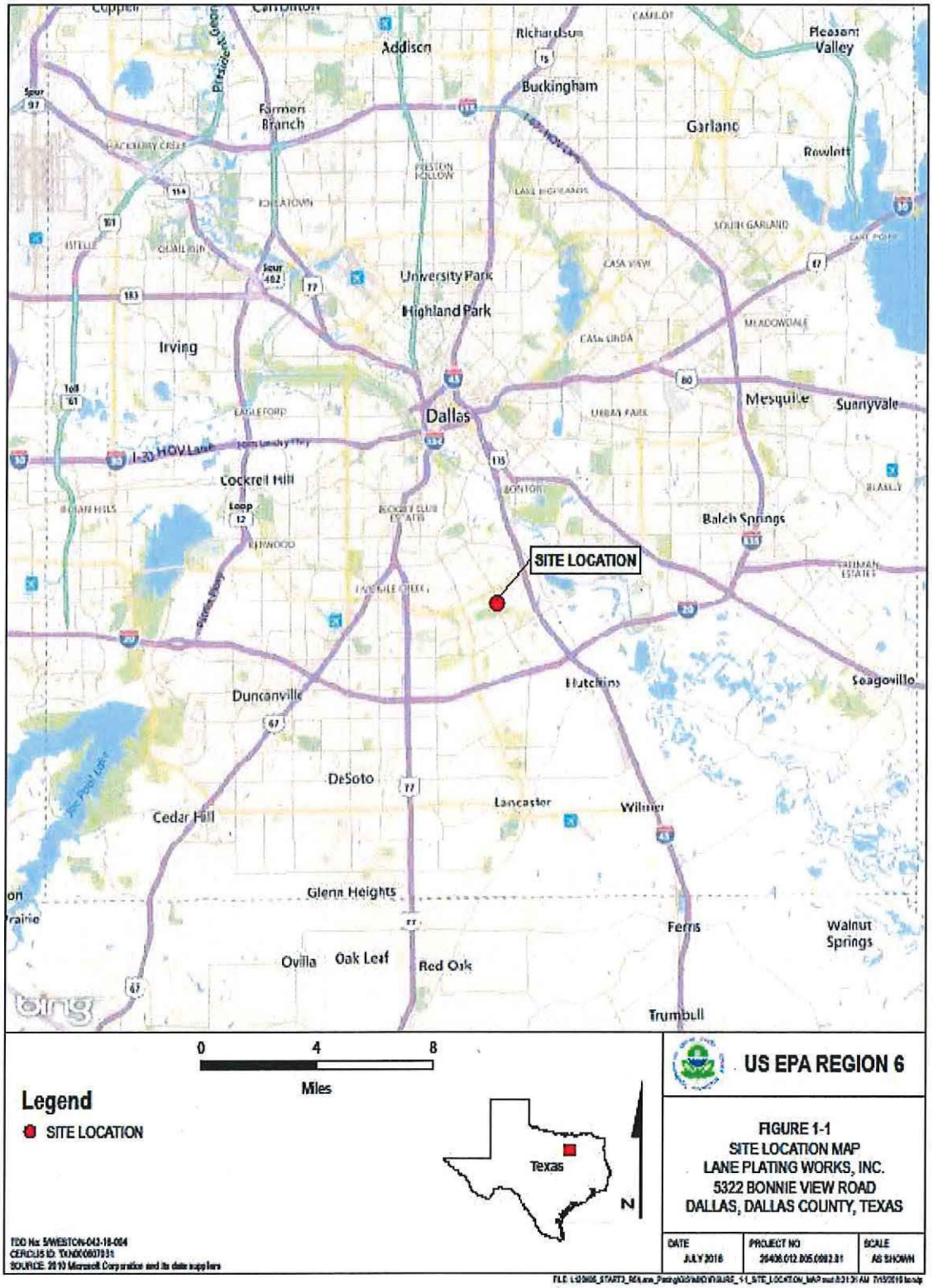
In April of 2016 the EPA Removal Program conducted a Removal Assessment at the Site and collected waste samples from materials inside the MPB as well as soil samples from grids surrounding the MPB and the HWTB. The liquid waste samples had a pH of less than 2 and contained high concentrations (100,000 – 296,000 mg/kg) of chromium. Seventeen (17) of the soil grids sampled around the MPB and HWTB exceeded the EPA R6 Screening Levels (RSL) for Hexavalent Chromium. Eight of the grids sampled exceeded the RSL's for lead.

2. Physical location

The Lane Plating Works, Inc. Site is located at 5322 Bonnie View Road, approximately five miles south of downtown Dallas, Dallas County, Texas (Figure 1-1). Land use is a mix of residential and commercial. The five acre Site is located immediately east of Bonnie View Road and is surrounded on all sides by open or wooded land. Single family residences are located west of the Site along Bonnie View Road and north of the Site on an adjacent property. The Site and the adjoining property east of the Site are currently owned by Stag Management, Inc.

3. Background

The Site was in operation for approximately 90 years. Operations ceased in late 2015 following a bankruptcy filing. The Site conducted primarily hard chromium and cadmium plating. Additional processes included chromate dips, chromic acid anodizing, black oxide coating, nickel plating, passivation, machining and grinding, and operating a lead melting pot to repair anodes used in the plating baths. Waste streams associated with the electroplating processes included corrosive waste, reactive waste, cadmium, chromium, lead, spent chromic acid solution, spent muriatic acid, chromate, metals filings and dust, cyanide waste, caustic waste, caustic soda solids (tank bottoms), and wastewater treatment sludges.


SITE LOCATION
Addison
Richardson
Pleasant Valley
Buckingham
Farmers Branch
Garland
Rowlett
University Park
Highland Park
Irving
Dallas
Mesquite
Sunnyvale
I-30 HOV Lane
Cockrell Hill
Balch Springs
Duncanville
Hutchins
Seagoville
DeSoto
Lancaster
Cedar Hill
Glenn Heights
Ferris
Walnut Springs
Ovilla
Oak Leaf
Red Oak
Trumbull
0
4
8
Miles
Legend
SITE LOCATION
Texas
N
US EPA REGION 6
FIGURE 1-1
SITE LOCATION MAP
LANE PLATING WORKS, INC.
5322 BONNIE VIEW ROAD
DALLAS, DALLAS COUNTY, TEXAS
DATE
JULY 2016
PROJECT NO
26408.012.005.0002.31
SCALE
AS SHOWN

4. Site Characteristics

The MPB contains a large number of tanks, drums, plastic totes, and open topped containment devices holding wastes associated with previous electroplating activities. Many of the containments are either leaking already or will soon if a removal action is not taken (See Figures 2, 3). During a 2014 inspection by OSHA, Lane Plating was cited for 21violations and fines totaling over $110,000. The inspection focused on incompatibility of wastes stored and subjecting employees to exposure of Hexavalent Chromium without proper safeguards. Previous inspections by the TCEQ estimate that there are approximately 20,000 gallons of waste materials inside the MPB and approximately 12 cubic yards of contaminated soils in supersacks being stored in the HWTB.

Figure 2

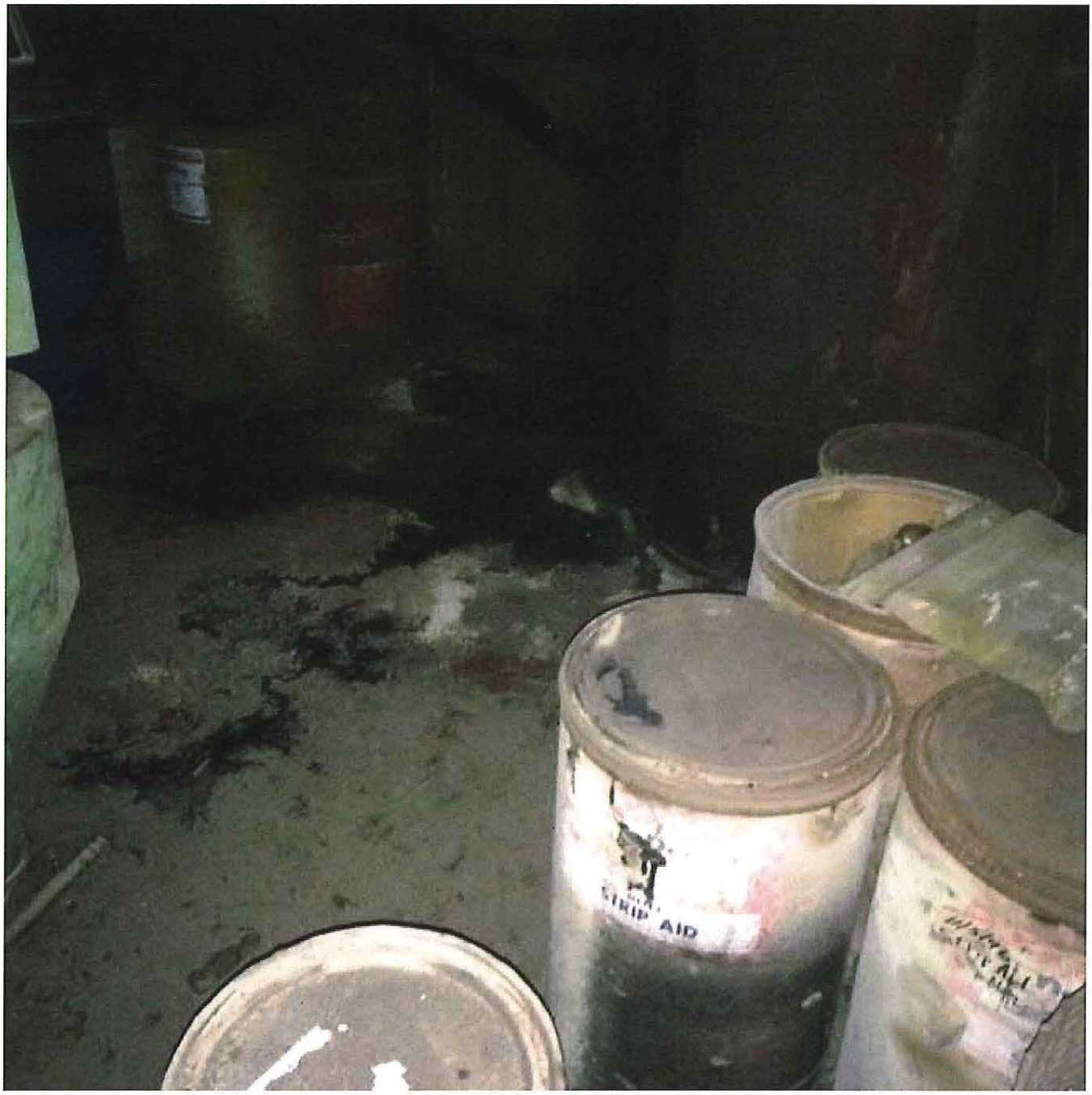


Figure 3

5. Release or threatened release into the environment of a hazardous substance, pollutant or contaminant

There is evidence of releases of hazardous substances throughout the MPB. There is excessive chromium staining on the floor and small pools of plating waste materials (Figure 3) from active ongoing releases. There is chromium staining on the sides of the MPB outside the building from past spills and releases. The OSHA cited Lane Plating for hexavalent chromium dust throughout the MPB and with not supplying their employees with proper respiratory protection.

6. NPL status

The Site is not currently on the National Priorities List, but in July 2016 underwent a Site Inspection (SI) and the surface water pathway is considered a pathway of concern.

7. Maps, pictures and other graphic representations

Attachment 1 Enforcement Addendum (Enforcement Confidential/ FOIA Exempt)
Figure 1-1 Area Map
Figure 2 Tank inside the MPB
Figure 3 Active leak inside the MPB

B. Other Actions to Date

1. Previous Actions

The TCEQ conducted Industrial Hazardous Waste (IHW) Compliance Evaluation Investigations (CEI) at the site in February 2010 and January 2011. Five alleged violations were found and hazardous wastes were observed on the southeast corner of the property. Analyses of soil samples from the area indicated high concentrations of leachable chromium, cadmium, lead, and mercury concentrations. A Notice of Enforcement (NOE) letter and a Proposed Agreed Order were transmitted to the facility on April 20, 2011 and July 5, 2011, respectively.

The TCEQ conducted a follow-up investigation on October 21, 2014, and noted several additional issues and alleged violations of IHW management, resulting in the initiation of a formal enforcement action. Investigators collected soil samples for analysis of total metals, hexavalent chromium, mercury, and aliphatic and aromatic hydrocarbons. Chromium and lead were found in concentrations above RSL's.

The OSHA conducted inspections at Lane Plating from October through December of 2014. In January of 2015, OSHA cited Lane Plating for 21 violations and fined the facility $110,000.

In December of 2015, the TCEQ's Emergency Response Contractor spent several days at the Site pumping chromic acid wastes from open sumps into plastic totes and securing the building.

2. Current actions

The Site has not been operational since 2015. The TCEQ exhausted State Enforcement Activities and referred the Site to the EPA Region 6 Superfund Program for further evaluation and cleanup.

C. State and Local Authorities' Roles

1. State and local actions to date

The TCEQ has had a history of investigation and enforcement activity at this Site (see Section B above). Also, as stated above, the Site has been referred to the EPA for assessment and possible action under its removal response authorities.

2. Potential for continued State/local response

The TCEQ continues to take an active role in maintaining security and health and safety at the Site. After a recent (July 2016) break-in by vandals, the TCEQ responded with their Emergency Response Contractor and re-secured the Site.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

A. Threats to Public Health or Welfare or the Environment

Current Site conditions meet the following factors, which indicate that there is a threat to the public health, welfare, and the environment, and that a removal action is appropriate under Section 300.415(b)(2) of the National Contingency Plan (NCP), 40 C.F.R. § 300.415(b)(2). Any or all of these factors may be present at a site, yet any one factor may determine the appropriateness of a removal action under CERCLA authority.

1. Exposure to Human Populations, Animals or the Food Chain, NCP Section 300.415(b) (2) (i)

There is potential for exposure of human populations and animals to chromium and lead which are hazardous substances as defined at CERCLA Section 101(14), 42 U.S.C. § 9601(14), and further defined at 40 C.F.R. § 302.4. Release of these contaminants has already been documented through previous sampling efforts and the potential for further release is great. People or animals coming into contact with the plating wastes or contaminated soils could become exposed to these contaminants and related compounds.

Although the Site is fenced, it has already been broken into and vandalized showing that the Site is easily trespassed upon. There are multiple residences within .25 miles of the Site.

2. Contamination of Drinking Water Supplies or Sensitive Ecosystems, NCP Section 300.415(b) (2) (ii)

There are two onsite water wells, however according to the TCEQ, groundwater in the area is not a useable resource. Surface water runoff from the Site flows in a southeasterly direction and is uncontrolled. The surface water pathway is a pathway of concern for potential ranking of the Site under the Hazard Ranking System (HRS). There are sensitive receptors and wetlands located downgradient of the Site which could be impacted from site runoff.

3. Hazardous Substances, Pollutants or Contaminants in Drums, Barrels, Tanks or other Bulk Storage Containers That May Pose a Threat of Release. NCP Section 300.415(b) (2) (iii)

According to findings by the TCEQ, there is approximately 20,000 gallons of waste liquids being stored in the MPB. As detailed previously there are both potential and active releases of these wastes ongoing at the Site. There are incompatible waste materials being stored improperly which present a threat as Site conditions and the integrity of the containers continues to deteriorate.

4. Weather Conditions that May Cause Hazardous Substances, Pollutants or Contaminants to Migrate or be Released. NCP Section 300.415 (b) (2) (v)

The Site has no electricity and the hot conditions present in summer months has already caused some of the plastic totes containing chromic acid wastes to overpressure due to the extreme changes in ambient temperatures.

5. Threat of Fire or Explosion. NCP Section 300.415 (b) (2) (vi)

There are incompatible wastes at the Site which have been stored improperly. There are both high and low pH materials as well as cyanides that were not stored separately and isolated as they should have been. As the integrity of the containers continues to degrade there is a possibility of incompatible waste streams mixing and causing an explosion and/or fire.

B. Threats to the Environment

Drainage from the Site flows in a southeasterly direction. There are wetlands downgradient from the Site that could be impacted by surface water runoff and that was the focus of a SI conducted in July of 2016. Sample results from the SI are pending at this time.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances, pollutants or contaminants from this Site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to the public health or welfare or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed Action Description

The wastes being stored inside the MPB and the HWTB will be profiled, removed from the buildings, bulked if possible and sent offsite for disposal. All disposal will be in accordance with the EPA's Off-site Rule, 40 CFR § 300.440, and CERCLA Section 121(d) (3), 42 U.S.C. § 9621(d) (3), and all transportation will be in accordance with Department of Transportation rules and regulations.

2. Contribution to Remedial Performance

The Site is not proposed for listing on the National Priorities List at this time, but doing so would not change the proposed removal action.

3. Description of Alternative Technologies

Since this action involves the removal and disposal of waste in containers, no alternative technologies were considered for this Site.

4. Applicable or Relevant and Appropriate Requirements (ARARS)

The proposed removal action will be conducted to eliminate the actual or potential exposure to hazardous substance, pollutant or contaminant pursuant to the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. S 9601 et seq., in a manner consistent with the National Contingency Plan, 40 CFR Part 300, as required at 33 U.S.C. § 1321(c) (2) and 42 U.S.C. § 9605. As per 40 CFR Section 300.415(j), fund-financed removal actions under CERCLA § 104 and § 106 shall, to the extent practicable considering the exigencies of the situation, attain the applicable or relevant and appropriate requirements (ARARS) under Federal environmental law.

5. Project Schedule

The duration of the proposed removal action is expected to be 3 weeks from the first workday onsite.

B. Estimated Costs

ESTIMATED COSTS

COST CATEGORY		CEILING
ERRS Contractor		$ 290,000
START Contractor		$ 52,000
Extramural Subtotal		$ 342,000
Extramural Contingency	20%	$ 68,000
TOTAL REMOVAL ACTION COST		$ 410,000

VI. ENFORCEMENT

The total EPA costs for this removal action based on full-time accounting practices that will be eligible for cost recovery are estimated to be $743,130.

(Direct Costs) + (Other Indirect Costs) + .6155(Direct Costs + Other Indirect Costs) = ($410,000) + ($50,000) + .6155($410,000 + $50,000) = $743,130

VII. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

If this action is not taken at the Site, conditions at the Site can be expected to continue to deteriorate, and the threats associated with the presence of hazardous substances will persist. Delayed action will increase both environmental and health risks posed by the release or threat of release of the wastes inside the MPB.

VIII. OUTSTANDING POLICY ISSUES

There are no outstanding policy issues associated with this Site.

IX. RECOMMENDATION

This Action Memorandum documents the approval of the time-critical removal action to be conducted at the Lane Plating Site, in Dallas, Dallas County, Texas, developed in

accordance with CERCLA, 42 U.S.C.§ 9601 et seq., and consistent with the NCP, 40 C.F.R. Part 300.

Conditions at the Site meet the criteria as defined by Section 300.415(b) (2) of the NCP, 40 C.F.R. § 300.415(b) (2), for a removal action. The total project ceiling for the Site as approved by the Superfund Division Director is $410,000.

APPROVED: Pam Phillips, Acting DATE: 9/6/16
Carl E. Edlund, Director
Superfund Division

Attachments